



APPLICATION GRANTED
SO ORDERED

9/27/21
[Signature]
John G. Koeltl, U.S.D.J.

GEORGIA M. PESTANA
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

DAMIAN P. GALLAGHER
Assistant Corporation Counsel
Phone: (212) 356-5054
E-mail: dgallagh@law.nyc.gov

September 27, 2021

By ECF

Honorable John G. Koeltl
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York, 10007

Re: *Henry v. City of New York, et al.*, 17 Civ. 3450 (JGK)

Your Honor:

I am an Assistant Corporation Counsel in the Office of Georgia M. Pestana, Corporation Counsel of the City of New York, and the attorney assigned the defense in the above-referenced matter. Defendants respectfully request the Court grant a two-day extension of time, from September 29, 2021 to October 1, 2021, for Defendants to file their letter explaining the need to seal Plaintiff's Exhibit G.¹ See ECF No. 159.

On September 24, 2021, Plaintiff filed a letter motion to seal Plaintiff's Exhibit G to the Declaration of Arianna Markel in Support of Plaintiff's Opposition to Defendants' Motions *in Limine*. ECF No. 157. Plaintiff wrote that Exhibit G was filed under seal because Defendants objected to filing the documents publicly. ECF No. 157; *see also* ECF No. 35. Pursuant to Rule VI.A.2 of Your Honor's Individual Practices, a party requesting a document to be sealed must file a letter within three days "explaining the need to seal or redact the materials."

Defendants' letter is currently due on September 29, 2021. Now, Defendants respectfully request that the Court extend their time to submit this letter by two days until October 1, 2021. Two additional days are necessary in this instance for supervisory review. Specifically, Ms. Goykadosh, the supervising attorney on this case, will be out-of-office on September 28, 2021 and

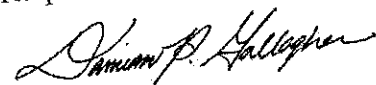
¹ The Court's Individual Practices dictate that this letter must be filed within three days. Plaintiff understands this to mean that the letter is due three days from Friday, September 24, 2021 and therefore would be due today, September 27, 2021. However, Defendants understand this to mean three business days and that the letter therefore would be due on September 29, 2021. To the extent that the letter would be due today, Defendants require until Friday for the reason explained *infra*.

September 29, 2021 for religious observances. She will return to office on September 30, 2021. Plaintiff consents to this request, which is the first request of its kind.

Therefore, Defendants respectfully request that the Court extend their time to file the letter from September 29, 2021 to October 1, 2021.

Thank you for your consideration herein.

Respectfully submitted,



Damian P. Gallagher
Assistant Corporation Counsel
Special Federal Litigation Division

Cc: By ECF
All Counsel of Record